



**STATE OF TENNESSEE  
DEPARTMENT OF COMMERCE AND INSURANCE  
REAL ESTATE APPRAISER COMMISSION  
500 JAMES ROBERTSON PARKWAY  
NASHVILLE, TENNESSEE 37243-1166  
615-741-1831**

**November 10, 2008  
Second Floor Conference Room, Andrew Johnson Tower**

The Tennessee Real Estate Appraiser Commission met November 10, 2008, at 9:10 a.m. in Nashville, Tennessee, at the Andrew Johnson Tower in the second floor conference room. Chairman, James E. Wade, Jr., called the meeting to order and the following business was transacted.

**COMMISSION MEMBERS PRESENT**

James E. Wade, Jr.  
Herbert Phillips  
Marc Headden  
Thomas R. Carter  
Kenneth Woodford  
William R. Flowers, Jr.

**COMMISSION MEMBERS ABSENT**

Jason West  
Najanna Coleman  
Dr. Edward A. Barylka

**STAFF MEMBERS PRESENT**

Nikole Avers, Administrative Director  
Jesse D. Joseph, Staff Attorney

**ADOPT AGENDA**

The Commission voted to adopt the agenda. Mr. Phillips made the motion to accept the agenda and it was seconded by Mr. Flowers. The motion carried unopposed.

**MINUTES**

The September 2008 minutes were reviewed. Mr. Flowers made the motion to accept the minutes as written. It was seconded by Mr. Phillips. The motion carried unopposed.

**GENERAL BUSINESS**

**Applicant Conference**

**James Plante** sent a letter to the Commission requesting an extension to his application to upgrade to certified general which ran over the one year allotment on November 1, 2008. Mr. Plante stated in the

letter that the reason that it had taken so long to complete the additional requirements, as a result of a 2007 experience interview, was that he lives in a rural area and he had a difficult time completing a multi-tenant report initially, so he requested a change to 90 hours of additional education and a demonstration report. He stated it took a long time to complete the education and then the demonstration report and he would like an extension so that he may now have enough time to complete the process. Mr. Plante had sent in the required education and demonstration report at the beginning of November and these were forwarded to Mr. Headden by Ms. Avers. After some discussion of an appropriate amount of time to allow to complete the remainder of the process, Mr. Headden recommended that the Commission allow Mr. Plante an additional six months to complete all requirements. Mr. Flowers made that recommendation in the form of a motion. Mr. Phillips seconded that motion. The motion carried unopposed.

### **Experience Interviews**

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**Mark E. Abbotoy** made application to upgrade from a certified residential appraiser to become a certified general appraiser. Mr. Wade was the reviewer and stated that he would recommend approval of his experience. Mr. Headden made the motion to accept the recommendation and Mr. Flowers seconded the motion. The motion carried unopposed.

**William A. Manthey** made application to upgrade from a registered trainee to certified general appraiser. Mr. Phillips and Mr. Headden were the reviewers and stated his reports were satisfactory recommended approval of his experience. Mr. Flowers made the motion to accept the recommendation and Mr. Carter seconded the motion. The motion carried unopposed.

**James Plante** made application to upgrade from a certified residential appraiser to become a certified general appraiser. Mr. Headden was the reviewer and stated that he needed additional time to review the demonstration report and requested the matter be deferred until next month.

**Elizabeth McCracken Sykes** made application to upgrade from a certified residential appraiser to become a certified general appraiser. Mr. Phillips was the reviewer and stated that he needed additional time to review the reports and requested the matter be deferred until next month.

**Sydney B. Hedrick** submitted reports for the 500 hour experience audit. Mr. Carter was the reviewer and stated that the work looked good.

**Bryan N. Montgomery** made application to upgrade from a registered trainee to become a certified general appraiser. Mr. Woodford was the reviewer and stated that three additional demonstration reports should be requested from Mr. Montgomery with stipulated matters to be address which Mr. Woodford discussed with the applicant. Mr. Phillips made the motion to accept the recommendation and Mr. Headden seconded the motion. The motion carried unopposed.

### **Education Committee Report**

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Dr. Baryla reviewed the education and submitted his recommendation to Ms. Avers via e-mail. There was only one course submitted for consideration for approval for November and Dr. Baryla recommended approval of the course "Appraising Distressed Commercial Real Estate" submitted by the Appraisal Institute (see report below). Mr. Flowers made the motion to accept Dr. Baryla's recommendation. Mr. Woodford seconded that motion. The motion carried unopposed.

## EDUCATION COMMITTEE REPORT

| Course Name         | Course Number | Course Name                                  | Instructors          | Hrs. | Type | Rec'd    |
|---------------------|---------------|--|----------------------|------|------|----------|
| APPRAISAL INSTITUTE | 1251          | Appraising Distressed Commercial Real Estate | William "Ted" Anglyn | 7    | CE   | Approved |

### LEGAL REPORT

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**Dwinn L. Terry** (approved 9/08) - signed Consent Order agreeing to revocation of her certificate of registration as a Registered Trainee. Respondent admitted that she fraudulently affixed her supervisor's electronic signature to an appraisal report and that she mailed to a client during a period of time her supervisor was out of town for a short vacation, and where the supervisor had not had an opportunity to review and approve said report, as required. Respondent had been previously disciplined in 2007 for virtually identical misconduct relative to a different appraisal. Respondent has agreed that her conduct violated T.C.A. §§ 62-39-326(4) & (5) and 62-39-329, the Preamble and the Ethics Rule of USPAP, and Tenn. Comp. R. & Regs. 1255-1-.12(4) (c) and 1255-1-.10(b) & (c).

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#### 1. L08-APP-RBS-2008006371 Commissioner Woodford was the Reviewer

A consent order was approved in this matter in May of this year, and in early August, the Respondent indicated he desired an informal conference – which was not conducted until October due to the Respondent's work schedule. Respondent has admitted in his appraisal that he did not consider approx. 130 sq. ft. of gross living area, that his garage adjustment was \$10,000 short of an adequate allowance given the garage estimate and replacement allowance of \$21,680, that he did not set out a significant functional obsolescence of the garage in the report as he should have in the cost approach, and that his size estimates of \$30/sq. ft. in the cost approach were low. Respondent has agreed that his actions violated SRs 1-1(b) and T.C.A. §§ 62-39-326(5) & 62-39-329, and he has requested that the Commission change the prior consent order approved in May and grant him continuing education credit for the required 15 hour site valuation and cost approach course.

**Prior Complaint / Disciplinary History:** None

**Recommendation and reasoning:** Respondent has been very cooperative with counsel, with the Administrative Director, and with Commissioner Woodford as reviewing member, and this is Respondent's first disciplinary infraction. As a consequence, we recommend that the Commission approve Respondent's request for approval for continuing education for the course, which would allow the matter to be closed upon signature of a revised consent order.

**Vote:** Mr. Flowers made the motion to accept the recommendation and Mr. Headden seconded the motion. The motion carried unopposed.

## **2. L08-APP-RBS-2008012871 Commissioner Carter was the Reviewer**

Complainant, who purchased the residence in April of 2007, contended that the Respondent's appraisal of the home conducted in April of 2007 resulted in an over-valuation of the subject. Respondent's 04/2007 appraisal was performed for refinancing purposes of the previous owner and was complete, with the work well documented. The data provided was adequate and the analyses, opinions, and conclusions were appropriate with no USPAP violations noted by Commissioner Carter. The Complainant provided the staff with a second appraisal performed by a different appraiser in April, 2008. Complainant was persuaded that this second appraisal for purposes of the Complainant's own refinancing very shortly after Complainant acquired the property, reflected that Respondent over-valued the property. Commissioner Carter reviewed both appraisal reports and found essentially that both appraisers reached a different value conclusion because the value of the property had changed during the time frame between the 2 appraisal dates.

**Prior Complaint / Disciplinary History:** None

**Recommendation and reasoning:** Due to the lack of any USPAP violations, Commissioner Carter recommends dismissal of this complaint.

**Vote:** Mr. Phillips made the motion to accept the recommendation and Mr. Headden seconded the motion. The motion carried unopposed.

## **3. L08-APP-RBS-2008012351 Commissioner Woodford was the Reviewer**

In October of 2007, Respondent developed and reported his self-contained appraisal report of a hotel constructed in 1972 with restaurant and approximately 110 rooms. Respondent's sales comparison and income approaches resulted in values of \$3,850,000 and \$3,750,000, respectively. A complaint was submitted by the purchaser alleging Respondent over-valued the property, this summer. In the sales comparison approach, Respondent used 3 hotels which were all constructed much later (1990-1998) the subject, which had far fewer rooms and which had no restaurants. Respondent also failed in the sales comparison approach to analyze the relationship of revenue of these properties against their sales prices, such as by using a gross revenue multiplier. The degree of comparability was limited and Respondent's analysis was limited. The Respondent also failed to report the seller in the subject's pending contract was to pay \$100,000 in the buyer's closing expenses, which would have resulted in a cash equivalent price of \$3,400,000. In the income approach, Respondent did not set out any history of the subject's past performance in the categories of either revenue or expense, which would demonstrate the relationship between historical items and projected items, and how such projections were supportable and reasonable. Based on the materials contained within the Respondent's workfile, it appears that a summary recap of room revenue, other income, expenses, etc., reflected a historical net income range between 2005 and 2006 of between \$202,000 and \$240,000, while the restaurant was being operated as an integral part of the hotel operation. However, based on the lack of considerable detailed analysis, it is difficult to understand how the probable net income going forward of \$375,000 per year (with the restaurant leased) is supported by the available evidence contained in the report or in the workfile. Moreover, the Respondent did not analyze within this report the effect on value of furniture, fixtures and equipment (FFE), where these non-real property items were included in the appraisal. A breakdown of FFE contribution to value is believed to be required in a report of this nature. Based on the problems cited,

Commissioner Woodford is of the opinion that the Respondent had violated SRs 1-4(a), 1-4(c)(ii) & (iv), 1-4(g), 1-5(a), 2-2(Comment), and 2-2(a)(vii) & (viii) of USPAP.

**Prior Complaint / Disciplinary History:** 941777 (Consent Order- courses); 199901940 (Letter of Warning)

**Recommendation and reasoning:** Commissioner Woodford recommends that the Respondent be offered a consent order with a requirement that he be asked to complete the following courses: Forecasting Revenue (7 online); Analyzing Operating Expenses (7 online); Small Hotel/Motel Valuation (7 online); and Report Writing & Valuation Analysis (40 classroom). Additionally, Respondent should be given the opportunity for an informal conference and if he rejects this proposal, a formal proceeding should be commenced. Mr. Headden posed the question of in an appropriate civil penalty should be included in the consent order given the nature and quantity of violations. There was discussion pertaining to the income of the restaurant and that this restaurant was proposed to be leased after purchase. There was also discussion of the functional obsolescence for greater room count than typical in newer motels. The recommendation was amended to include that the Respondent not complete any motel/hotel/hospitality property appraisals until he completes the educational requirements of the consent order successfully.

**Vote:** Mr. Flowers made the motion to accept the recommendation and Mr. Phillips seconded the motion. The motion carried unopposed.

#### **4. L08-APP-RBS-2008017441 Commissioner Wade was the Reviewer**

The complaint was filed by an attorney representing his clients. The complaint alleged that the Respondent was involved in a fraudulent mortgage transaction as the owner of a realty company and investor in properties, which he sold through agents in his office, solicited an appraiser to complete a misleading or fraudulent residential appraisal report and included the involvement by a specified group of individuals to defraud the purchases of a residential property.

The staff of the Tennessee Real Estate Commission was contacted by the staff of the Tennessee Real Estate Appraiser Commission. The staff determined that there are or have been at several individuals of the same name as this Respondent licensed by the State of Tennessee. Of those, one is a real estate appraiser and the remainder are real estate agents. An address comparison was made and a real estate agent with a Knoxville address was the person named in the matter submitted by the Complainant. It was determined that the Respondent **is not** the person named in this matter.

**Prior Complaint/Disciplinary History:** None.

**Recommendation and reasoning:** Since a complaint has been filed with the Tennessee Real Estate Commission and has been opened against the correct Respondent, staff and counsel for the TREAC, and Commissioner Wade recommend **dismissal** of this complaint against this Respondent who was misidentified.

**Vote:** Mr. Headden made the motion to accept the recommendation and Mr. Woodford seconded the motion. The motion carried unopposed.

**5. L08-APP-RBS-2008017451 Commissioner Wade was the Reviewer**

Respondent is the subject of ongoing litigation involving mortgage fraud allegations and that he was solicited to complete a fraudulent residential appraisal report to defraud the purchasers of a residential property. Respondent submitted to the Administrative Director a retrospective appraisal of August 14, 2004 using comps that occurred in June, July and August of 2007. The report Respondent submitted to the TREAC office has the 08/14/04 date in the transmittal letter, on the first and second pages of the report, on the certification page and on two of the addenda pages. Respondent changed the effective date on the certification page of this report to 08/14/07 without disclosing that he had altered the 2004 report. Respondent also does not disclose the additional 288 sq. ft. of comp 2 as per CRS, he uses a very low \$10/sq.ft. size adjustment for the difference between the subject and sale no. 2, he mischaracterizes Marshall and Swift's Residential Cost Handbook as his source for the "reproduction cost" in the cost approach instead of the "replacement cost" as set forth in the Handbook, and he does not state any opinion of reasonable exposure time linked to his value opinion.

**Prior Complaints/Disciplinary History:** None.

**Recommendation and reasoning:** Due to the pending litigation against Respondent and other entities, Commissioner Wade recommends that this file be kept open and placed on litigation monitoring status, and flagged when the results of the litigation against respondent and others are determined. There was some discussion of whether this was a retrospective appraisal or if the effective date on the appraisal was misreported. There was also additional discussion of the Respondent altering the report that was submitted to the Commission to reflect a changed effective date. Ms. Avers brought about discussion of whether it would be improper to hold this file open in pending status because of litigation and restated to the Commission that the ASC had warned against this practice during the last field review because of the timeliness of complaint resolution. Also, findings of USPAP violations are not contingent on the outcome of litigation. Legal counsel stated he could see reasons for both holding the file open to insure consistency with findings and also for proceeding ahead without waiting for civil litigation resolution.

**Vote:** Mr. Woodford made the motion to accept the recommendation and Mr. Headden seconded the motion. The motion carried unopposed.

**6. L08-APP-RBS-2008018841 Commissioner Wade was the Reviewer**

The Complainant, a consumer from out of state, alleged that the Respondent over-valued a residential property in a construction loan appraisal (October 22, 2007) and then again in a post-construction loan for permanent financing (June 6, 2008) by indicating a value of \$260,000 in both appraisals. The complainant stated his purchase price was to be \$225,000 and the construction loan was for \$180,000. The permanent financing loan was for \$235,000. Out of concerns raised about the value of the property, the Complainant had another appraisal of the property completed by a different appraiser. The indicated value on this appraisal report was \$164,500 less than a year after the initial appraisal completed by the Respondent, and only a month subsequent to the second appraisal completed by the Respondent. Other issues identified were:

1. Inaccurately describing the subject style as Ranch, when the dwelling is a split foyer style home with the lower level above ground and exterior vinyl siding.
2. All comparable sales selected were of larger size ranch style home of superior quality and having brick exteriors.

3. Misreported information in the report which included stating the house was on a crawlspace, when it was on a slab; reporting the subject has an attached garage, when the garage is built-in; and report the subject windows have screens when they do not.
4. The floor plan is also alleged to be inconsistent with the subject's layout.

The Respondent stated in her response letter that she appraised the stated property twice, and on the second appraisal, though the value didn't change, three additional comparables were added. She stated the original appraisal was based on plans and specifications and the specs from the builder report the home as a ranch on a crawlspace; however, on the subsequent appraisal these were changed to split foyer on a slab. She further stated that ranch style homes were used as comparables because they were similar in square footage, bedroom and bathroom totals and they were not all brick as the Complainant alleged. She stated the garage is built-in as the Complainant alleged, but that is how the plans and specifications read from the original assignment and the floor plan also is a reflection of this plan. She assumed the screens would have been in the construction package.

Commissioner Wade found the major errors or commissions to be as follows:

The Respondent did not explain the results of the analysis of the contract of sale in the report as required by USPAP. The Respondent did not report that the contract included concessions. The Gross Living Area of all of the sales is larger than the Gross Living Area of the subject. The foundation of the dwelling is slab, but is reported to be a crawl space in the report. (See Photographs).

The design of the property is reported to be a ranch with an attached double garage, when it is actually a 2 story with a built-in double garage. The lot size of sale 2 is reported to be .43 acres, but CRS indicates 0.77 acres. MLS indicates the lot size of sale 3 is 1.0 acre, but the size of the lot is reported to be 0.56 acres. No adjustments were made in the report. The appraiser did not report or analyze that a *Declaration of Restrictions* (Homeownership Association) was set up for the subdivision.

The proximity of the sales to the subject appears to be incorrectly reported. The style and quality of the construction of the subject are reported as *Good*. The style and quality of the subject and comparables sales appears to be average; therefore, they appear to be incorrectly reported. According to the MLS information, sale 3 was constructed in 1989, but is reported to be constructed in 1999. The age adjustment appears to be low.

The 2-story subject is compared to 1-level, ranch homes without adjustment. The size adjustment is based on \$15.00 per square foot v. \$85.00 cost new estimate. It appears low.

In the Cost Approach, the \$25,000.00 adjustment for a small deck, stairs and landing, and a heat pump appear to be excessive. The difference in the 1,870 heated area size indicated in the plans and the 1,912 square feet reported is not explained in the report. The Respondent reports that the property is listed for sale, but did not report the listing price.

Based on a CRS drawing, the photograph of comparable 1 does not appear to be the correct photograph.

The copies of the reports sent in by the Respondent to the TREAC appear to have been altered to reflect the style of the homes as split foyer and the foundation as being on a slab. The effective date of the appraisal and the date signed by the appraiser are the same in the original copy and the altered copy.

The appraiser made gave no notification that the changes were made in report submitted to the TREAC. The appraiser is in violation of the Ethics Rule-Conduct. It appears that this is an attempt by the appraiser to mislead the TREAC.

**License History:** Registered Trainee 9/24/1997 to 8/27/2001  
Certified Residential 8/27/2001 to Present

**Prior Complaint / Disciplinary History:** None

**Recommendation and reasoning:** After completing appraisal reviews on the two appraisal reports captioned above, Commissioner Wade is of the opinion that given his scope of work, the reports by the Respondent are incomplete due to substantial errors of omission or commission that significantly affect the appraisals. The accuracy of the data is in question. The appraisal services were rendered in a careless or negligent manner, such as by making a series of errors that in total may affect the value conclusion. Due to errors in the two mentioned reports and the attempt by the appraiser to alter the copy of the appraisal report submitted by the Respondent to the TREAC; taking into consideration that the Respondent has had not prior complaints, Commissioner Wade recommends that a consent order imposing a \$3,000 civil penalty be offered to the Respondent, and that she be offered an informal conference. If she does not agree to the consent order, Commissioner Wade recommends that a formal proceeding be commenced. There was some discussion at the recommendation was revised to include a 15 hour site valuation and cost approach course with successful completion of the examination.

**Vote:** Mr. Woodford made the motion to accept the recommendation and Mr. Headden seconded the motion. The motion carried unopposed.

#### **7. L08-APP-RBS-2008019921 Commissioner Wade was the Reviewer**

The Complainant, a mortgage lender, alleged that the Respondent over-valued 28 acres of land. The complainant stated in July of 2007 a loan was approved for \$523,600 on 28 acres of land based on a loan to value ratio of 55%. The market value indication on that appraisal was for \$925,000. In July of 2008 this loan went into default and the bank foreclosed on the property. A new appraisal was conducted procedurally as part of this process and the indicated market value was \$350,000 on July of 2008. In August of 2008 a third appraiser was conducted to provide the lender with two market value appraisals. The first based on the total acreage, as appraised in the previous two appraisals, the second based on the land being subdivided into two parcels. The first appraisal came in at \$250,000 for the total acreage. The second come in at \$200,000 each or a total of \$400,000. The lender stated they expected some decline in value due to the current economic conditions, but they did not expect the value to decline between 58% and 74% in thirteen months.

The Respondent stated in his response letter that property in question lies along a lake with approximate lake frontage of 1,800 to 1,900 feet. He stated based on his research three comparables were chosen that exhibited similar attribute to the subject as being tracts of land that have similar amounts of lake frontage and exposure. He further stated that in appraising land for this area it is best to establish a per acre value, being that is the predominant way acreage is marketed, bought and sold. He stated the comparables used are now 23 to 26 months old and the market has changed since that time. The Respondent provided two additional land sales with lake frontage that sold one month after the effective date of his original appraisal as additional supporting documentation. He stated further that he has seen



significant declines in that particular market and does not feel that the property was over-valued at time it was appraised.

Commissioner Wade found the major errors committed and the general USPAP issues to be as follows:  
General USPAP Issues:

**Ethics Rule-Conduct:**

An appraiser must perform assignments ethically and competently, in accordance with USPAP. [Ethics Rule] In the opinion of the Commissioner Wade, the Respondent did not perform the appraisal assignment in an ethical and competent manner. It appears that the Respondent did not provide sales information on properties that were located in close proximity to the property. Also, the Respondent did not provide information about the subject property that is deemed pertinent and readily available in his report that is required in order to arrive at a reasonable estimate of value.

**Neighborhood:**

The Respondent indicates on page 3 of the Land Appraisal Report form that the property is located in a suburban area and over 75% built up. Other available information indicates that the property is in a rural area. The Respondent does not address percent of vacancy. He discusses Nashville and Davidson County, when the property is located in Wilson County. This misinformation can significantly affect the decisions that the client makes about the property. [SR 1-1 (c); SR 2(b) (iii)]

**Site:**

Respondent does not provide the zoning classification, but only gives a description of the zoning classification. He indicates that present improvements do conform to zoning regulations, when the property has no improvements, and fails to indicate how the off site improvements are maintained. He does not provide information on the restrictive covenants of the Subdivision, that the property is encumbered by a TVA power line easement or regarding the Corp of Engineers' restrictions on boat docks in the area. [SR 1-1 (c); SR 1-3 (a)]

**Sales Comparison Approach:**

Commissioner Wade cannot verify the sale of comparable sale 1 as one parcel from CRS records. It appears that the sale may be multiple parcels in Phase 1 of Camelot Cove. The sale was disqualified by the property assessor for physical differences. Assuming that the acreage information provided by the Respondent is correct and that the property is a 25 acre tract, the Respondent's calculation of the per acre value is in error; it should be \$30,132.00 per acre. According to the information from the property assessor, comparable sale 2 has an easement deed. Seller indicates that the property is a future subdivision; Respondent says the highest and best use of the subject is the existing use.

Comparable sale 3 is classified by the property assessor as a disqualified non-arm's length transaction.

The Respondent has failed to report and explain any possible differences in the sales. He made no adjustments in the grid having an adjusted value range of \$17,054.00 to \$55,000.00 per acre. He fails to provide an analysis of the sales used in the sales comparison approach or an explanation of how he arrived at an estimated value of \$34,000.00 per acre.

He failed to use or discuss 7 sales that are located on the same street as the subject that sold in 2005, 2006 and 2007 and prior to the date of the appraisal that had a value range of \$4,934 to \$26,667 per acre;

far below his estimated value of \$34,000.00 per acre. The sales ranged in size from 5.01 acres to 24.32 acres. Based on the review, it appears that Respondent over-valued the property. [SR 1-1 (b), (c); SR 1-4 (a); SR 2-2 (b) (iii) and (viii)]

On page 5 of the report, Respondent did not identify the intended users of the report.  
[SR 1-2 (a)]

|                         |                       |                         |
|-------------------------|-----------------------|-------------------------|
| <b>License History:</b> | Registered Trainee    | 9/18/1998 to 9/25/2001  |
|                         | Licensed Appraiser    | 9/25/2001 to 10/24/2002 |
|                         | Certified Residential | 10/24/2002 to 1/8/2008  |
|                         | Certified General     | 1/8/2008 to Present     |

**Prior Complaint / Disciplinary History:** 200504504 (Dismissed)

**Recommendation for Commission:** Commissioner Wade recommends that Respondent be offered a proposed consent order agreeing to pay a civil penalty of \$5,000.00 for USPAP violations and over-valuation of the subject property in the appraisal report dated May 30, 2007 and be required to take a 2-day USPAP class with no continuing education credit. Also, that Respondent be offered an opportunity for an informal conference and if he rejects this proposal, that a formal proceeding be commenced.

**Vote:** Mr. Phillips made the motion to accept the recommendation and Mr. Woodford seconded the motion. A vote was called. Mr. Flowers and Mr. Headden voted "no" on the matter. Mr. Carter, Mr. Phillips, Mr. Woodford voted "yes" on the recommendation. The motion passed.

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Being no further business, the meeting was adjourned at 11:00 a.m.

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Chairman, James E. Wade, Jr.

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Nikole Avers, Administrative Director